

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C, 20554**

<b>In the Matter of</b>	)	
	)	
<b>Section 68.4(a) of the Commission's Rules</b>	)	<b>WT Docket No. 01-309</b>
<b>Governing Hearing Aid-Compatible</b>	)	<b>RM-8658</b>
<b>Telephones</b>	)	
	)	

**SEMI-ANNUAL REPORT**

PetroCom License Corporation (“PetroCom”), by its attorneys, and pursuant to the Order adopted by the Federal Communications Commission (“FCC” or “Commission”) in the above referenced proceeding on August 14, 2003<sup>1/</sup> and the Public Notice released by the FCC on March 8, 2004<sup>2/</sup> hereby submits its semi-annual report regarding interoperability between certain digital wireless phones and hearing aids.

**I. INTRODUCTION**

PetroCom provides cellular services in the Gulf of Mexico (the “Gulf”) from areas offshore Brownsville, Texas to Mobile, Alabama. In the fall of 2004, PetroCom completed construction of the first digital cellular network in the Gulf of Mexico. The network employs Global System for Mobile Communications (“GSM”) technology to provide enhanced, secure, and high-speed communications for companies in the offshore industry. The network also employs Enhanced Data rates for GSM Evolution (“EDGE”) technology to enable the delivery of advanced mobile data services, including high-speed Internet access, video downloading, and full multimedia messaging.

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<sup>1/</sup> *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, Report and Order*, 18 FCC Rcd 16753 (2003) (“HAC Order”).

<sup>2/</sup> “Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers,” *Public Notice*, WT Docket No. 01-309 (rel. Mar. 8, 2004).

## II. SEMI-ANNUAL REPORT

Customers of PetroCom's digital network -- the only digital cellular network in the Gulf - operate GSM digital wireless handsets. PetroCom generally offers its customers GSM handset models from Nokia, Motorola and Sony Ericsson. Pursuant to Section 20.19(c)(2)(i) of the Commission's rules, carriers were required to make available two models of HAC compliant handsets by September 16, 2005.<sup>3/</sup> On September 8, 2005, the FCC released an order adopting the recommendation of the HAC Incubator Working Group 9 to accept, until August 1, 2006 the HAC compliance rating for 1900 MHz handset operation as the overall compliance rating for GSM digital wireless dual band handsets.<sup>4/</sup> The Order effectively designated dual band handsets as HAC compliant when only the 1900 MHz band operations meet the HAC ratings standard. As a result of the Order, PetroCom was able to meet the requirements of Section 20.19(c)(2)(i).<sup>5/</sup>

Through its website, PetroCom has made available information regarding two HAC compliant dual band handsets it offers to customers. Those two models are the Motorola V220 and Motorola V3. Because of the nature of PetroCom's operations (pursuant to which it generally sells to corporate, as opposed to individual, customers), it does not maintain retail

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<sup>3/</sup> 47 C.F.R. 20.19(c)(2)(i) (2005).

<sup>4/</sup> Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Memorandum Opinion and Order*, FCC 05-166, (rel. Sept., 8 2005) ("GSM Waiver Order" or "Order").

<sup>5/</sup> Although the rules required carriers to offer HAC compatible handsets by September 16, 2005, PetroCom offered those handsets by October 31, 2005. As noted above, PetroCom is a provider of cellular services in the Gulf of Mexico. Pursuant to the FCC's Public Notice DA 05-2406 PetroCom was excused from complying with a variety of obligations (including those under Part 20 of the FCC's rules) until October 31. *Wireless Telecommunications Bureau Announces Extension of Filing and Regulatory Deadlines for Wireless Licensees in Areas Impacted by Hurricane Katrina*, Public Notice, DA 05-2406 (rel. Sept. 1, 2005). As required by the Commission's Public Notice of October 21, 2005, there is attached a Certification from Ken Wright, stating that PetroCom was a carrier affected by Hurricane Katrina. *Extending Filing and Regulatory Deadlines for Wireless Licensees in Areas Impacted by Hurricanes Katrina and Rita*, Public Notice, DA 05-2744 (rel. Oct. 21, 2005). In light of these circumstances, and the FCC's September 8, 2005 Order, PetroCom has complied with Section 20.19(c)(2)(i) of the Commission's rules.

outlets from which it sells handsets. Instead, handsets are generally sold via telephone. PetroCom's website and customer service specialists are the means through which it educates customers regarding the available HAC compliant handsets. Furthermore, PetroCom's staff works with customers with disabilities to ensure that those customers obtain a digital handset that meets the customer's needs. After a customer places an order, PetroCom can, within 24 hours, obtain the requested handset from its third party vendor. Therefore, PetroCom meets the obligations of FCC rule section 20.19(c)(2)(i) of the Commission's rules because it now provides two HAC compliant handsets to its customers and markets those handsets through its website and customer service representatives.

### **III. CONCLUSION**

PetroCom hereby submits the foregoing semi-annual report regarding its compliance with the FCC's HAC requirements. PetroCom will continue to provide the FCC with updated information in future reports. The FCC is asked to direct any questions regarding the report to the undersigned.

Respectfully submitted,

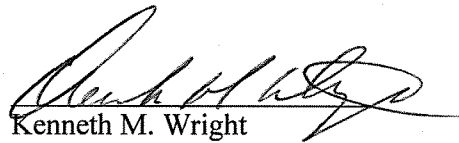
/s/ Russell H. Fox

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Dated: November 16, 2005

### **Hurricane Katrina Relief Certification**

I, Kenneth M. Wright, President and Chief Operating Officer of PetroCom License Corporation ("PetroCom"), hereby certify under penalty of perjury that the foregoing request for waiver of Section 20.19(c)(2)(1) of the FCC's rules could not be submitted by the September 16, 2005 deadline for compliance with that rule because of the impact of Hurricane Katrina on PetroCom's operations. PetroCom serves the Gulf of Mexico and its headquarters were located in Harahan, Louisiana, a suburb of New Orleans.



Kenneth M. Wright

Date: 10/27/05